

175832

NHTSA-00-8011-49



801 W. Artesia Blvd., Compton, CA 90220, 877-232-0665 (Phone) 310-900-5581 (Fax)

May 31, 2002

The Honorable Jeffrey Runge M.D.  
Administrator  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, DC 20590

Dear Mr. Runge:

I am writing regarding the proposed FMVSS 139 that would replace FMVSS 109 and the proposed modification to FMVSS 119.

First, it is clear that bias-ply tires will not be able to pass the proposed FMVSS 139 standards due to the heat build up inherent in bias-ply design. Thus, FMVSS 139, as proposed, will eliminate all bias-ply D.O.T. approved tire production. Thousands of consumers, light truck hobbyists, mud racers, rock climbers, hunters, and even farmers will be deprived of a perfectly safe bias-ply alternative to the radial tire.

Second, specialty radial tires will become much more expensive and cost prohibitive for those same consumers if the radial tire for their work or hobby trucks must conform to the testing standards in the FMVSS 139 and the modified FMVSS 119. The cost to produce and test these radial tires will be so high that we will again deprive the consumer of a safe, reasonably priced tire. The manufacturers of these special bias and radial tires will suffer a loss of businesses, as well as small businesses, distributors, dealers, and a host of other ancillary and supporting industries suffering huge financial set backs and bankruptcies across the specialty tire market.

We agree with NHTSA's proposal and the need for increased reporting and enhanced tire performance requirements for the 287 million mass produced mass market light vehicle tires, however, these proposed regulations would put an undue burden on the specialty tire industry; an industry, that has an outstanding, unchallenged safety record. This record alone calls into question the need for any changes in the present set of testing standards.

It is my position that the existing FMVSS 109 and 119 have served as the benchmark for the development and quality of specialty tires since their inception. The safety and quality levels our products enjoy are a direct result of these standards. We respectfully request that the agency determine that these standards should be retained for specialty, limited production tires as defined in NPRM Reporting of Information and Documents about Potential Defects-Docket No. NHTSA 2001-8677-Notice 2. Specifically tires produced in quantities of less than 15000 per size and type.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ward".

Scott Ward  
President, Pro Competition Tire Co.

EXECUTIVE SECRETARIAT

2002 JUN -3

P 3:03

5823

E32002060823